

United States Bankruptcy Court  
Eastern District of Texas  
Sherman Division

**In re:**

**Empire Countertops, LLC**

1137 Enterprise Dr.  
Pilot Point, TX 76258  
EIN: 45-1145076

**Debtor**

**Empire Countertops, LLC,**  
Plaintiff

v.

**JPMorgan Chase & Co., Eagle Eye  
Advance LLC, Block Inc. fka Square Inc.,  
and Last Chance Funding, Inc.**  
Defendants

**Case No. 22-41686-btr**

**Chapter 11**

**Emergency Hearing Requested**

**Adversary No. 22-04066**

**MOTION FOR EMERGENCY HEARING ON DEBTOR'S  
APPLICATION FOR INJUNCTIVE RELIEF**

Empire Countertops, LLC ("Empire") files this *Motion for Emergency Hearing* on its Application for Injunctive Relief (Doc. 1), and would respectfully show the following:

1. Empire asks that a hearing be set not later than 10:00 a.m. on Monday, December 12, 2022, for approximately thirty minutes for the Court to consider Empire's application for injunctive relief (Doc. 1). Because the Defendants are holding on to cash in Debtor's operating accounts and Debtor and the funds are necessary for the Debtor to continue operations.

2. Notice of the proposed expedited hearing will be provided to all parties receiving notice via the Court's ECF system. Additionally, Empire will provide notice of the proposed expedited hearing to the listed creditors and their attorneys if known. Such notice is sufficient because all parties in interest will have received notice.

3. A hearing was not requested earlier because the case was filed on December 5, 2022, a demand for a return of the funds was sent to creditors on December 7 and December 8, but the creditors have refused to return the funds.

DATED: December 9, 2022.

Respectfully submitted:

NORRED LAW, PLLC

By:   /s/ Clayton L. Everett    
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Proposed Counsel for Plaintiff/ Debtor

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this Motion for Expedited Hearing and accompanying Motion were served on the Office of the U.S. Trustee and upon the parties receiving notice via the Court's CM/ECF system.

The LCF Group, Inc.  
3000 Marcus Ave. Suite 2W15  
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By:   /s/ Clayton L. Everett